

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

RYAN BRESLOW, ALEX FINE, and JON  
GORDON,

Plaintiffs,

v.

MARK PHILLIPS and BENJAMIN REED,

Defendants.

Action No.: 23-cv-20727-ALTMAN/Reid

Honorable Roy K. Altman

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MOVEMENTDAO and MARK PHILLIPS,

Counterclaim-Plaintiffs

v.

RYAN BRESLOW, ALEX FINE, and JON  
GORDON,

Counterclaim-Defendants

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**PLAINTIFFS' RESPONSE TO MOTION FOR CLARIFICATION**

Plaintiffs Ryan Breslow, Alex Fine, and Jon Gordon (“Plaintiffs”) hereby file the following Response to the Motion for Clarification, ECF No. 93, pursuant to the Court’s instruction at the Preliminary Injunction hearing held on May 30, 2023.

Plaintiffs, through their counsel, contacted Robinhood Markets Inc. (“Robinhood”) to inquire whether the \$5,000 transfer limit on Robinhood accounts could be removed to facilitate compliance with the Court’s Temporary Restraining Order (“TRO”), ECF No. 18. As part of that process, Plaintiffs provided Robinhood with a copy of the TRO. Over the course of several days, Robinhood eventually informed Plaintiffs that it was actively working to address Plaintiffs’ request but did not have a final response as of the date of this filing. Plaintiffs recommend submitting an additional update on June 16, 2023.

Plaintiffs’ position is that the TRO-covered assets in Defendants’ control should be returned to the Movement DAO endowment account directly through Robinhood, if possible. If direct transfer from Robinhood is not possible, Plaintiffs propose in the alternative that the funds be transferred to the Clerk of Court to be held in escrow pending the outcome of this litigation. Plaintiffs object to the multi-step transfer process proposed by Defendants at the May 30 hearing.

Dated: June 9, 2023

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of June 2023, the foregoing was electronically filed with the Clerk of the Court by using CM/ECF system, which will send a notice of electronic filing to authorized CM/ECF files.

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*/s/ Jamie L. Katz*

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